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8 UNITED STATES DISTRICT COURT

9 DISTRICT OF NEVADA

10 MICHAEL CORY WANLESS,

11 Plaintiff,

12 vs.

13 MARTIN O'MALLEY,
14 Commissioner of Social Security,

15 Defendant.
16

Case 2:24-cv-01225-BNW

STIPULATED MOTION FOR REMAND
and [PROPOSED] ORDER

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18 IT IS HEREBY STIPULATED by and between the parties, through their undersigned
19 attorneys, and with the approval of the Court, that the Commissioner of Social Security has agreed
20 to a voluntary remand of this case pursuant to sentence four of 42 U.S.C. § 405(g). The purpose
21 of the remand is to offer Plaintiff a new decision.

22 On remand, the Appeals Council will direct the ALJ to develop the record as necessary, to
23 provide the claimant an opportunity to submit additional evidence in support of his claim, and to
24 issue a new decision.

25 The parties further request that the Clerk of the Court be directed to enter a final judgment
26 in favor of Plaintiff, and against Defendant, reversing the final decision of the Commissioner.
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28

1 DATED October 21, 2024.

Respectfully submitted,

2 Law Offices of Lawrence D. Rohlfing, Inc., CPC

3 By: s/ Marc V. Kalagian
4 MARC V. KALAGIAN
5 Attorney for Plaintiff
6 (By email authorization)

7 JASON M. FRIERSON
8 United States Attorney

9 By: s/ Julie A.K. Cummings
10 JULIE A.K. CUMMINGS
11 Special Assistant United States Attorney
12 Office of Program Litigation, Office 7

13 Attorneys for Defendant

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15
16 IT IS SO ORDERED:

17 
18 HON. BRENDA WEKSLER
19 UNITED STATES MAGISTRATE JUDGE

20 DATED: 10/23/2024
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